

APPENDIX B

SUMMARY OF PUBLIC COMMENTS

PUBLIC INPUT MEETINGS

In the spring, an informational notice was sent to people on the Consolidated Plan mailing list inviting individuals, agencies, and organizations to participate in the preparation of the Montana Consolidated Plan Annual Action Plan for the year beginning April 1, 2009. Display advertisements were placed in major newspapers around the state asking for public comment, giving dates and locations of the upcoming public input meetings. Additional display advertisements for each of the individual meetings were placed in the local newspapers, and personal invitation letters were sent to local officials, public agencies, and interested citizens in each area. The meeting notices were also posted on the *Discovering Montana* E-Calendar at:

<http://app.mt.gov/cal/html/event?eventCollectionCode=comm>

The information on the dates, times, and locations of the public meetings was also posted on the "Current Events" section of the Consolidated Plan web page:

http://housing.mt.gov/Hous_CP_Apps.asp

In May and June 2008, two on-site community input meetings were held in Whitefish on May 8 and in Great Falls on June 12.

The Whitefish meeting was being held during the lunch break for the Montana Board of Housing's Tax Credit Workshop and included a free lunch buffet. In Great Falls, a breakfast meeting was held in conjunction with the biennial statewide housing conference. HOME, CDBG, and the Montana Board of Housing representatives were present at all the meetings and an ESG representative was available at the Whitefish meeting to answer questions and respond to public comments.

Turnout at the public input meetings was very good. In addition to MDOC and MBOH staff, 40 people signed in at Whitefish. Sixty-three people, in addition to MDOC and MBOH staff, signed in at the Great Falls meeting.

PUBLIC REVIEW MEETINGS

The draft Consolidated Plan Annual Action Plan for 04/01/2009 – 03/31/2010 was released to the public in early October 2008. A public comment period was open through December 31, 2008. Notifications were sent to individuals and organizations on the Consolidated Plan mailing list. Display advertisements were placed in key newspapers announcing: the comment period, the website address for the documents, where to obtain hard copies of the document, where to send written comments, and the

date and locations of the public review meeting. The meeting notice was also posted on the *Discovering Montana* E-Calendar and the Consolidated Plan web page.

Four public review meetings were held in October:

- 1) **Glendive**: Wednesday, **October 15, 2008**; EPEC Building, 313 South Merrill Ave.
- 2) **Billings**: Thursday, **October 16, 2008**; Best Western Kelly Inn, 4915 Southgate Dr.
- 3) **Missoula**: Wednesday, **October 29, 2008**; Wingate Inn, 5252 Airway Boulevard
- 4) **Great Falls**: Thursday, **October 30, 2008**; NeighborWorks Building, 509 1st Ave. S.

To maximize participation and minimize travel time and costs, the Consolidated Plan meeting was held over the lunch hour at the free housing application workshops and Neighborhood Stabilization Program (NSP) public information meetings. Participating agencies for the housing workshop included the MDOC's MBOH, HOME and CDBG programs, and USDA Rural Development. Representatives from each program presented an overview of the housing programs, application process and deadlines.

Housing Application Workshop and Consolidated Plan Meeting

8:00 a.m. to 4:30 p.m.

Tentative Agenda

8:00 – 8:30	Registration (coffee & treats available)
8:30 – 8:45	Welcome & Introductions
8:45 – 9:45	USDA RD Housing Programs
9:45 – 10:30	CDBG Program
10:30 – 10:45	Break
10:45 – 11:45	NEW Neighborhood Stabilization Act (HR 3221)
11:45 – 12:00	Break / Set up for lunch
12:00 – 1:15	Consolidated Plan Public Meeting (lunch provided)
1:15 – 1:45	HOME Program Proposed Changes
1:45 – 2:00	Break
2:00 – 2:30	HOME Program
2:30 – 3:00	MBOH Low Income Housing Tax Credits
3:00 – 4:30	MDOC/MBOH Program Updates

MTHousingSearch.com/Technical Assistance/"White Paper"/
Section 8 Housing Assistance Program Online Application

In addition to staff, 14 people attended the Consolidated Plan meeting in Glendive, 24 in Billings, 30 in Missoula, and 27 in Great Falls.

MEETING SUMMARIES

Copies of the meeting summaries from the public input meetings are on file with the Montana Department of Commerce, Housing Division; 301 South Park Avenue; P.O. Box 200545; Helena, Montana 59820.

Public Comments

A variety of comments were received at the meetings, as well as some written comments. In general, the questions were program-specific. Many of the comments and questions received were about the NSP program. Some questions were able to be answered on the spot by representatives from the individual programs. Other questions requiring a more in-depth response were referred to the appropriate program staff for follow-up.

HOME Program Changes

Proposed changes that the HOME Program implemented are discussed in more detail in the 2009 Annual Action Plan. Some comments were received regarding changes to the HOME Program, which the Program is not prepared to implement:

1. Soft Costs for Tenant Based Rental Assistance (TBRA)

Comment: HUD does not allow soft costs for TBRA activities under the HOME program and that makes a difficult program impossible. Not only is a local jurisdiction required have match of 5% for TBRA funds, they now need to fund administrative costs out of other scarce funds.

Response: The HOME Program is allowed by regulation to pass through its 10% administrative funds to state recipients. However, the admin dollars are limited and the state is not able to pass down those dollars and maintain operations at the state level to oversee the program. The HOME Program does not receive any other financial support to operate the program.

2. Single Family Noncompetitive Program (formerly Single Family Allocation Pilot Program)

Comment: Allow qualified entities to provide homebuyer assistance and homeowner rehabilitation with Single Family Allocation program funds within the city limits of Billings, Great Falls and Missoula.

Response: The state of Montana's allocation of HOME funds is limited and has not been keeping up with inflation. The cities of Billings, Great Falls and Missoula receive their own allocation of HOME funds from HUD, and the HOME Program is willing to share information and documents with any city that wants to replicate the program within its jurisdiction.

3. HOME Application Process

Comment: Change the application process to be more in line with the other two major housing funding programs within the MDOC; i.e., the CDBG and Low Income Housing Tax Credit (LIHTC) programs. The housing applications can be similar, often for the same project; the questions being answered are phrased a little differently but are similar; and it would be nice if the face sheet of the Uni-App could say: "also applying for CDBG, LIHTC and HOME" and turn it into one truly consolidated application, because the three applications are arduous.

Response: While the programs recognize that the application process is not easy and there appears to be duplication of effort, the programs have differing Federal requirements each must meet. The LIHTC program follows IRS requirements; the CDBG and HOME program are governed by HUD requirements; however, the HUD regulations governing each program are different.

There are areas currently in the Uniform Application (Uni-App) where applicants can indicate the other funding sources for which they are applying. The three programs do, and will continue to, coordinate internally on joint applications and

work to coordinate funding announcement dates and streamline the application process where appropriate.

4. Interest Rate Buy-Down

Comment: Allow interest rate buy-down as an eligible activity for the HOME Program. There are proposed changes in Rural Development Housing Services low-interest loan programs and there may be a need for interest rate buy-down as a use of HOME and CDBG programs. These should only be considered if the grantee has demonstrated a way to recapture the subsidy provided by the interest rate buy-down. Homes in the most expensive areas of Montana can be purchased today only with Rural Development low interest loans, so without these loans another source of interest rate buy down is needed.

Response: For the HOME Program to implement this new program, it would take considerable staff time to investigate and develop the guidance/rules to make it work. The program is not in a position to implement a new program at this point in time. In addition, how the current economic upheaval may affect the home buying market is unknown. However, the HOME Program will investigate allowing interest rate buy-down as an eligible activity in the future.

5. Homebuyer Education Requirements

Comment: The HOME Program should mandate homebuyer education that meets the National Standards for any home purchased with HOME funding. The National Standards are well accepted in the industry as minimum standards for homebuyer education.

Response: HUD currently recommends/encourages homebuyer education, but does not require it. However, the state HOME Program currently requires, and will continue to require, homebuyer education as a prerequisite for any homebuyer receiving HOME down payment and closing cost assistance. The HOME Program believes its grantees are doing a good job meeting the homebuyer education requirements and does not want to be unnecessarily prescriptive.

6. Enhanced Accessibility Requirements

Comment: The HOME Program should adopt enhanced accessibility requirements, rather than just minimal standards, and to encourage adoption of visitability as a minimal standard in all funded housing.

Response: All HOME grantees must meet federally established standards for accessibility. The HOME Program encourages, and will continue to encourage, grantees to adopt enhanced accessibility requirements and to adopt visitability as a minimum standard in all HOME-funded housing.

7. Match Requirement for Single Family Noncompetitive Program

Comment: The HOME Program currently requires 5% match for each homebuyer or homeowner under the Single Family Noncompetitive Program. It can be especially difficult to come up with the 5% match for homeowner rehabilitation

projects. Could matching contributions from one activity in excess of the match obligation for that activity be carried forward and applied as credit toward match for another activity that does not have sufficient match?

Response: The HOME Program will consider modifying the match requirements for the Single Family Noncompetitive Program. However, the Program needs time develop the guidance, rules, and tracking mechanisms to implement this change. The Program is implementing a new software system that may help facilitate such a change.